

PETER G. SIACHOS
PSIACHOS@GORDONREES.COM
DIRECT DIAL: (973) 549-2532

GORDON & REES
SCULLY MANSUKHANI

ATTORNEYS AT LAW
18 COLUMBIA TURNPIKE, SUITE 220
FLORHAM PARK, NJ 07932
PHONE: (973) 549-2500
FAX: (973) 377-1911
WWW.GORDONREES.COM

Admitted In: NJ, NY, DC, SC and PA

July 15, 2016

VIA ECF

The Honorable Joseph F. Bianco
United States District Judge
United States District Court, Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

RE: *Bautz v. ARS National Services, Inc.*
Case No. 2:16-cv-00768-JFB-SIL

Dear Judge Bianco:

This firm represents Defendant ARS National Services, Inc. in the above-referenced matter. The Court has scheduled oral argument of ARS's motion to dismiss Plaintiff Virginia Bautz's Complaint, which currently is scheduled for July 27, 2016 at 4:30 p.m. My pregnant wife surprised me with a vacation for most of that week (perhaps the last vacation we will get without children for a while), and I am unfortunately not available on that date. As such, in accordance with Part I.D. of Your Honor's Individual Practices, we respectfully request a short adjournment of the oral argument to a date that also is available and convenient for the Court and Plaintiff's counsel. Plaintiff's counsel has consented to this request for an adjournment. This is the first request for an adjournment, and the prospective adjournment will not affect any any other calendared date. We have coordinated our calendar with Plaintiff's counsel's calendar, and the following dates are free for all counsel: August 3, 4, 5, 17, 19, 23, and 24. We are most appreciative for Your Honor's consideration.

Respectfully Submitted,

/s/ Peter G. Siachos

PETER G. SIACHOS

cc: Gus Michael Farinella, Esq. – counsel for Plaintiff (via ECF)